

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

Gregory A. Miller, M.D.,

Plaintiff,

v.

MagMutual Insurance Company,

Defendant.

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C/A No.: 0:24-cv-1212-SAL

**SUPPLEMENT TO RESPONSE TO
MOTION TO DISMISS AND STAY (ECF
13)**

Notice of Deposition Duces Tecum

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF YORK)	FOR THE SIXTEENTH CIRCUIT
)	
Angela Patton, as Next Friend of)	C.A. NO.: 2009-CP-46-5195
Alexia L., a minor,)	
)	
)	
Plaintiff,)	NOTICE OF DEPOSITION DUCES
)	TECUM
vs.)	
)	
Dr. Gregory A. Miller, and Rock Hill)	
Gynecological & Obstetrical Associates)	
P.A.,)	
Defendants.)	

TO: Harry L. Goldberg
Finkel Law Firm, LLC
PO Box 1799
Columbia, SC 29202

Attorney for the Defendant/Judgment Debtor

PLEASE TAKE NOTICE that the Plaintiff, pursuant to Rule 30 and Rule 69 of the South Carolina Rules of Civil Procedure, will take the deposition of Gregory A. Miller, M.D. on July 16, 2024, beginning at 11:00 a.m. at Finkel Law Firm, 1201 Main Street, Suite 1800, Columbia, SC 29202, before some officer authorized to administer oaths in the state of South Carolina, or some other official authorized by law to take depositions. The deposition may be recorded by sound-and-visual means. A stenographer will be present. The oral examination will continue from day to day until its completion.

You are commanded to bring all documents listed in Exhibit A.

June 12, 2024

GRAHAM LAW FIRM, P.A.

BY: /s/ Edward L. Graham
122 Donald Dr.
Pendleton, South Carolina 29670
Telephone: 864-527-0483
Email: egraham@grahamlawfirm.net

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this date a copy of the foregoing Notice of Deposition Duces Tecum was duly served upon each party to this cause via electronic mail as follows:

Harry L. Goldberg
Finkel Law Firm, LLC
hgoldberg@finkellaw.com

s/ Eugene Benton
Eugene B. Benton

EXHIBIT A

1. All documents related to the creation of sole enterprise businesses, partnerships, corporations, LLCs, trusts, joint ventures, investment clubs, or other for-profit entities in which Dr. Miller had an ownership interest or received income, (“Business Entity” or “Business Entities”) which were in existence at any time between November 25, 2009 and the present.
2. All documents related to the sale, gift or other transfer of an ownership interest in and/or income from a Business Entity.
3. All documents related to the termination or dissolution of a Business Entity.
4. End-of year statements for all financial accounts owned in whole or in part by Dr. Miller or a Business Entity, at any time between 2009 and the present, including but not limited to checking, savings, certificates of deposit, money market, stocks, bonds, mutual funds, ETFs, closed end funds, investment clubs, annuities, cryptocurrency wallets or accounts, and all other bank accounts, stockbroker accounts, investment and financial accounts known by any name.
5. All Federal and State income tax returns filed for tax year 2009 through the present for Gregory A. Miller, MD, (whether an individual or joint return), including all W-2s, 1099s, other forms, schedules, and other attachments.
6. All Federal and State income tax returns filed for tax year 2009 through the present for any other individual name(s) used by Dr. Miller; and all such returns filed for Business Entities, including all W-2s, 1099s, other forms, schedules, and attachments, If a Business Entity used a fiscal year other than a calendar year, these materials should be provided for all fiscal years which include all or part of the referenced tax years.

7. All loan applications, financial statements and other loan application documents for loan applications made by Dr. Miller and/or a Business Entity from 2009 through the present.
8. All notes, IOUs, and loan documents payable to Dr. Miller which were created between 2009 and the present.
9. Deed to all real estate owned by Dr. Miller, in whole or in part, for any period of time between 2009 and the present.
10. Deed to the current owner of the real estate which is the primary residential property in which Dr. Miller and/or his family reside.
11. Homeowner's insurance application and policy on the residential property in which Dr. Miller and/or his family reside, irrespective of who holds title to such property.
12. All retirement account end-of-year statements for all retirement accounts owned in whole or in part by Dr. Miller from 2009 through the present.
13. All contracts and agreements regarding employment of Dr. Miller between 2009 and the present, irrespective of whether Dr. Miller worked full-time or part-time, and irrespective of whether the employer was a hospital, a medical practice, a Business Entity, or some other person or entity.
14. If Dr. Miller's direct employment is or was with a medical practice, Business Entity, other person or entity, rather than a hospital, all contracts and agreements between the hospital and the medical practice, Business Entity, other person or entity regarding the work performed by Dr. Miller.
15. All documents regarding title or other indicia of ownership or acquisition of specific items of personal property owned in whole or in part by Dr. Miller and/or a Business

Entity at any time between 2009 and the present having a value in excess of \$2,000, including but not limited to aircraft, boats, trailers, automobiles, trucks, recreational vehicles, precious metals, bullion, watches, jewelry, art, wine, firearms, sporting goods, antiques, rugs, collectibles, technology, and the like.

16. Documents evidencing mortgages, liens, security interests, or other encumbrances on the value of any of the above items.